

EX PARTE OR LATE FILED

**HOGAN & HARTSON**  
L.L.P.

July 29, 2002

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**Ex Parte – REDACTED – FOR PUBLIC INSPECTION****BY HAND DELIVERY****RECEIVED**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445-12th Street, S.W., TW-B204  
Washington, D.C. 20554

JUL 29 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: Application of Qwest Communications International, Inc.  
To Provide In-Region InterLATA Services in the States of  
Colorado, Idaho, Iowa, Nebraska and North Dakota,  
Docket No. 02-148**

Dear Ms. Dortch:

In response to questions from Commission staff, Qwest is providing information regarding its offering of pre-order to order integration capabilities. Specifically, Qwest is providing LSR rejection rates for New Access, a CLEC that performs integrated pre-order and order functions through IMA-EDI in Colorado, Iowa, Nebraska and North Dakota as of June 2002. Additionally, Qwest is providing LSR rejection rates for Hewlett-Packard Consulting, the pseudo-CLEC that performed integrated pre-order and order functions through IMA-EDI during the ROC OSS test. This material is hereby submitted for inclusion in the record for the above-referenced proceeding.

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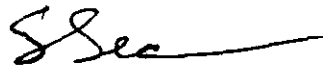
Marlene H. Dortch

July 29, 2002

Page 2

The twenty-page limits do not apply as set forth in DA 02-1390.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sumeet Seam', with a long horizontal flourish extending to the right.

Sumeet Seam

Enclosures

cc: M. Carowitz  
M. Engel  
R. Tanner  
E. Yockus  
G. Remondino  
M. Cohen  
J. Prisbey  
J. Jewel  
P. Baker  
C. Post  
P. Fahn  
B. Smith

Actual commercial usage as well as independent third-party testing demonstrate that CLECs that have developed integrated interfaces can achieve low rates of rejected LSRs. New Access, a CLEC that operates in Colorado, Iowa, Nebraska and North Dakota, has affirmed that it performs pre-order/order integration through its IMA-EDI interface as of June 2002. *See Qwest July 25 Ex Parte on Pre-order to Order Integration.*

**[REDACTED – FOR PUBLIC INSPECTION]**

HP's findings during the ROC OSS test further confirm that achievement of successful integration through IMA-EDI is associated with a low rate of rejections. As indicated in the attached e-mail and tables, for the four months between January 2002 and April 2002, out of a total of 889 UNE-P retest orders that HP submitted via its integrated IMA-EDI interface, only 12.15% of these orders were rejected. Additionally, HP affirmed that the errors that caused those rejects were attributable to issues unrelated to pre-order to order integration. These data from New Access and HP demonstrate that Qwest's offering of parsing and integration capabilities have enabled them to submit a very high percentage of orders that are not rejected.

**New Access Reject Rates (June 2002)**

**. REDACTED-FOR PUBLIC INSPECTION**

-----Original Message-----

From: Don Petry [mailto:dpetry@ix.netcom.com]  
Sent: Friday, July 26, 2002 4:18 PM  
To: ROC TAG Members  
Cc: Geoff May  
Subject: RE: Request for Information

Pursuant to Qwest's request to provide an analysis of the most recent 4 months of reject information for UNE-P LSRs in the ROC OSS PID re-test, HP provides the following summary and attached information.

Table 1 and Chart 1 represent the P-CLEC UNE-P PID re-test LSR activity via IMA EDI for the last four months of the ROC 271 test.

Table 1 and Chart 1 reflect the number of Original, Supplemental and FATAL reject transactions for the UNE-P Product.

Table 2 on the Error Analysis tab of the Excel spreadsheet shows the number of FATAL rejects by Category. Column C lists Examples of Error Messages received by the P-CLEC.

As described in the HP Final Report, HP integrated the address information from the pre-order transaction into the End User form. Issues not related to pre-order/order integration generated these 108 FATAL rejects.

Don Petry  
770-861-9621

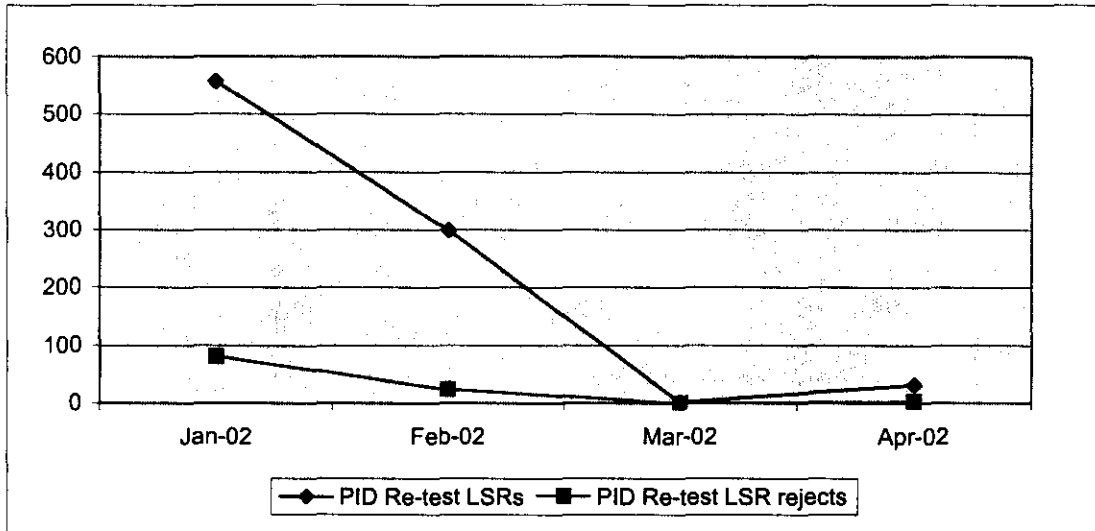
for

Geoff May  
HP Services Consulting & Integration  
978-376-3773

**Table 1**

Month	Original LSRs	Supplemental LSRs	Total LSRs		FATAL Reject	% of Transactions Rejected
Jan-02	545	12	557		81	14.54%
Feb-02	297	2	299		24	8.03%
Mar-02	1	0	1		0	0.00%
Apr-02	29	3	32		3	9.38%
Totals	872	17	889		108	12.15%

**Chart 1**



# TABLE 2

Category	# of instances	Examples of Error messages
<b>USOC issues</b>	<b>24</b>	
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: OC1
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: 999AL
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: UXTA3
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: HSO
<b>Data Entry/ Template Error</b>	<b>47</b>	
		LSR Form:Admin Section:AN required when ACT is Z
		RESALE Form:Service Details Section 2:LNUM required when ACT is Z
		LSR Form:Admin Section:DDD cannot be earlier than current date
		LSR Form:Admin Section:LSO required when APTCON is not populated and LNA is N
		DSR Form:DL Form 1:Listing Control Section:DOI required when ACT is N
<b>Data Mismatch &amp;</b>	<b>37</b>	
<b>Test Bed issues</b>		LSR Form:Admin Section:TOS does not match SCATEG on reserved TN
		Invalid NPA-NXX/State combination: 208-338/CO
		End User Name, TN, and/or address are inconsistent
		Could not find original Work Order ID for supplement
		(redacted) does not match PON used in Pre-order TN reservation (redacted) for TN redacted
<b>Total</b>	<b>108</b>	